1 2 3 4 5 6 7 8 9 110 111	DAVID OFFEN-BROWN - #063321 (CÁ) RAYMOND T. CHEUNG - #176086 (CA) EQUAL EMPLOYMENT OPPORTUNITY COMMISSION San Francisco District Office 350 The Embarcadero, Suite 500 San Francisco, CA 94105 Telephone: (415) 625-5649 Facsimile: (415) 625-5657 raymond.cheung@eeoc.gov Attorneys for Plaintiff EQUAL EMPLOYMENT OPPORTUNITY COMMISSION DAVID B. SIMPSON - #106326 (CA) WOLFLICK & SIMPSON 180 North Brand Boulevard, Suite 410 Glendale, Califonia 91203 Telephone: (818) 243-8300 Facsimile: (818) 243-0122				
12 13	Attorneys for Defendants AMELCO ELECTRIC S. F. INC. and AMELCO CORPORATION				
14	UNITED STATES DISTRICT COURT				
15	NORTHERN DISTRICT OF CALIFORNIA				
16					
17	EQUAL EMPLOYMENT OPPORTUNITY) COMISSION,	Case No. C 05-02492 MEJ (MED)			
18 19 20 21 22 23	Plaintiff, v. AMELCO ELECTRIC SAN FRANCISCO, INC.) AND AMELCO CORPORATION, Defendants.	STIPULATED REQUEST TO BRIEFLY EXTEND DEADLINE FOR CONDUCTING MEDIATION; AND ORDER THEREON Proposed Mediation Date: Feb. 8, 2006 Mediator: Michael W. Bien			
2425	Plaintiff EQUAL EMPLOYMENT OPPORTUNITY COMMISSION and Defendants AMELCO				
26	ELECTRIC S.F. INC. and AMELCO CORPORATION, by and through their respective undersigned				
27	counsel, here by stipulate, and by this Stipulation request the Court's approval, pursuant to Local Rul				
28	6-2, and ADR Local Rule 6-4(b), to the following:				
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- 1. By this Stipulation, the parties respectfully request a brief extension of the deadline for conducting a Mediation in this case, and a corresponding waiver of the Motion/timing requirements for requesting such an extension, to permit a Mediation to occur on February 8, 2006, a date agreed to (subject, of course, to the Court's approval) by all parties, all counsel, and by the Mediator.
- 2. This case was referred to Mediation before Mediator Michael Bien. Our current deadline for holding the Mediation is January 18, 2006, and a Mediation was set for January 18. Unfortunately, a (somewhat disputed) scheduling issue unexpectedly arose at the last minute, relating to the timing of the Mediator's receipt of a Mediation Statement, causing the Mediator to declare a desire/need to continue the Mediation. All parties, all counsel and the Mediator have cooperated in identifying the next globally-available date for Mediation as **February 8, 2006.** Everyone has reserved that date.
- 3. Counsel realize that pursuant to ADR Local Rule 6-4(b) and the ADR Handbook, Mediations are to be held within 90 days of the referral to Mediation unless the Court for "good cause" orders otherwise. The parties submit that such "good cause" exists for this requested extension:
 - (A) Per LR 6-2(a)(1) and ADR Local Rule 6-5(b)(1), the reasons for this Request are that the Mediator unexpectedly declared a need/desire for a continuance, the parties have cooperated and desire a new date that will satisfy everyone. The February 8 date will accomplish that, requiring just a brief extension of the normal, 90-day deadline for Mediations.
 - (B) Per ADR Local Rule 6-5(b)(2), all parties concur in this Request.
 - (C) Per LR 6-2(a)(1), no prior extensions of this or any other deadline have been requested or granted in this case.
 - (D) Per LR 6-2(a)(2), this requested time modification will not affect any other scheduled due dates or deadlines for this case.
- 4. Prior to filing this Stipulated Request, undersigned defense counsel contact this Court's courtroom deputy clerk, who referred counsel to the Court's law clerk, for advice on the accepted format for presenting this Request.

1	5. This Stipulated Request is not presented for purposes of delay. Rather it is presented in			
2	good faith by diligent parties in an effort to re-calendar an important Mediation for this case.			
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4	6. For the reasons stated, the parties hereby respectfully request that this Stipulation be			
5	accepted as and when presented, and that, for good cause shown, this Court hereby extend the deadline			
6	for the conduct of a Mediation in this case to, and including, February 8, 2006, in order for a Mediation			
7	to be conducted in this case on that date.			
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10	EQUAL EMPLOYMENT OPPORTUNITY COMMISSION			
11				
12	Dated: January 18, 2006. By /s/ Raymond T. Cheung RAYMOND T. CHEUNG			
13	Attorneys for Plaintiff EQUAL EMPLOYMENT OPPORTUNITY COMMISSION			
14				
15	WOLFLICK & SIMPSON			
16				
17	Dated: January 18, 2006. By /s/ David Simpson			
18	DAVID B. SIMPSON Attorneys for Defendants AMELCO ELECTRIC			
19	S. F. INC. and AMELCO CORPORATION			
20				
21	PURSUANT TO STIPULATION, IT IS SO ORDERED.			
22	TES DISTRICA			
23				
24	Dated:January 18, 2006 AJAMES AJAMES It Is so ORDERED Address Address			
25	Judge Maria-Elena James			
26				
27 28	TERN DISTRICT OF CO			
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1	PROOF OF SERVICE				
2	STATE OF CALIFORNIA, COUNTY OF LOS ANGELES				
3	I am employed in the county of Los Angeles, State of California. I am over the age of 18 an not a party to the within action; my business address is 130 North Brand Boulevard, Glendale, Californi 91203.				
5 6 7 8	On January 18, 2006, I served the foregoing document described as: STIPULATED REQUES TO BRIEFLY EXTEND DEADLINE FOR CONDUCTING MEDIATION; AND ORDE THEREON on the interested parties in this action by placing a true copy thereof enclosed in seale envelope(s) addressed as follows: Raymond T. Cheung Equal Employment Opportunity Commission ADR Unit- U.S. District Court 450 Golden Gate Avenue				
10 11	San Francisco District Office 350 The Embarcadero Suite 500 San Francisco, California 94105-1260 San Francisco, California 94105-1260				
12 13	Michael W. Bien Rosen, Bien & Asaro, LLP 155 Montgomery Street, 8th Floor San Francisco, California 94104				
14151617	XXX (BY MAIL) as follows: I am readily familiar with the firm's practice of collection an processing correspondence for mailing. Under that practice it would be deposited with U.S postal service on that same day with postage thereon fully prepaid at Glendale, California in the ordinary course of business. I am aware that on motion of the party served, service is presume invalid if postal cancellation date or postage meter date is more than one day after date of depos of mailing in affidavit.				
18 19	(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee(s).				
20	(BY OVERNIGHT COURIER) I caused to be delivered via overnight courier to the offices the addressee(s).				
21		(State) I declare under penalty of perjury under to is true and correct.	he laws of the State of California that the abov		
2223	XXX	(Federal) I declare that I am employed in the offi direction the service was made.	ce of a member of the bar of this court at whos		
24	Executed on January 18, 2006, at Glendale, California.				
2526		NARINEH LEON	/S/		
2728		4			